

# **VII. LAW ENFORCEMENT TERRORISM PREVENTION PROGRAM**

## **VII. The Fiscal Year 2004 Law Enforcement Terrorism Prevention Program (LETPP)**

### **A. Program Overview**

The FY 2004 LETPP seeks to provide law enforcement communities with enhanced capabilities for detecting, deterring, disrupting, and preventing acts of terrorism. The FY 2004 LETPP will provide law enforcement communities with funds for the following activities: 1) information sharing to preempt terrorist attacks; 2) target hardening to reduce vulnerability of selected high value targets; 3) threat recognition to recognize the potential or development of a threat; 4) intervention activities to interdict terrorists before they can execute a threat; 5) interoperable communications; and 6) management and administration.

The State Administrative Agency (SAA) must coordinate the implementation of this program with the State's Lead Law Enforcement Agency (LLEA). When identifying administrative and planning needs, each grantee should assess current staffing levels and determine whether a portion of the FY 2004 LETPP funds should be used to enhance administrative capabilities within the LLEA .

### **B. Program Requirements**

Each State shall obligate not less than **80 percent** of LETPP funds to local units of government **within 60 days after the grant award**. If requested in writing by a local unit of government, the State may retain some or all of the local unit of government's allocation of grant funds for purchases made by the State on behalf of the local unit of government. States holding grant funds on behalf of local units of government must enter into a memorandum of understanding with the local unit of government specifying the amount of funds to be retained by the State for purchases. This agreement must be kept on file with the SAA. States and local units of government must utilize their State Homeland Security Strategies (SHSS) as the basis for the allocation of funds to meet prioritized needs to enhance and refine their preparedness efforts. There must be a clear correlation between the goals and objectives identified in the SHSS and in the FY2004 LETPP program activities.

### **C. Authorized Program Expenditures**

**1. Information Sharing to Preempt Terrorist Attacks:** These funds will allow law enforcement communities to purchase equipment and support efficient and expeditious sharing of information and intelligence that could preempt possible terrorist attacks.

**2. Target Hardening to Reduce Vulnerability:** Funds provided under this category will allow law enforcement communities to make vulnerable targets more resistant to attack or more difficult to remove or damage.

**3. Threat Recognition:** Funds provided under this category will allow law enforcement personnel to purchase equipment and conduct additional training that assists in further recognizing the potential or development of a threat.

**4. Intervention Activities:** Funds provided under this category will allow law enforcement personnel to purchase equipment and conduct activities to further enhance their capabilities to prevent domestic terrorism incidents.

**5. Interoperable Communications:** Funds provided under this category will allow law enforcement personnel to purchase equipment to ensure interoperable communications between, and among, law enforcement agencies and other emergency service disciplines such as fire and emergency management.

### **Allowable Planning Costs**

- Development of and participation in information/ intelligence sharing groups
- Point vulnerability analyses and assessments
- Development and review of site security buffer zone plans
- Soft target security planning (public gatherings)
- Development, implementation and review of Area Maritime Security Plans for ports, waterways, and coastal areas.
- Updating and refining threat matrices
- Conducting local or regional implementation meetings
- Hiring of full or part-time staff or contractors/consultants to assist with intervention activities (not for the purpose of hiring public safety personnel)
- Developing or updating local or regional communications plans
- Development or enhancement of cyber security plans
- Development or enhancement of cyber risk mitigation plans
- Conducting cyber risk and vulnerability assessments

### **Allowable Organizational Activities**

- Overtime costs for personnel to participate in information, investigative and intelligence sharing activities specifically related to homeland security. This includes activities such as Anti-Terrorism Task Forces, Joint Terrorism Task Forces, Area Maritime Security Committees (as required by the Maritime Transportation Security Act of 2002), and Terrorism Early Warning Groups. Funding may not be used to supplant ongoing, routine public safety activities of State and local law enforcement. No more than 20% of LETPP funds may be used for overtime costs for the organizational activities noted above without prior approval from ODP. If a state or local law enforcement agency wishes to exceed the 20% overtime limit, a written request may be submitted to DHS-ODP through the SAA. The SAA will be notified of DHS-ODP's decision within two weeks.

## Allowable Equipment Costs

The following list is intended as a guide. If State agencies and local units of government have questions about eligibility of equipment not specifically addressed below, the SAA must contact the assigned ODP Preparedness Officer for clarification.

Authorized equipment purchases may be made in the following categories:

1. Personal Protective Equipment (PPE)
2. Explosive Device Mitigation and Remediation Equipment
3. Interoperable Communications Equipment
4. Physical Security Enhancement Equipment
5. Terrorism Incident Prevention Equipment
6. CBRNE Logistical Support Equipment
7. CBRNE Incident Response Vehicles
8. CBRNE Reference Materials
9. CBRNE Response Watercraft
10. Intervention Equipment
11. Cyber Security Enhancement Equipment
12. Other Authorized Equipment

**1. Personal Protective Equipment** - Equipment worn to protect the individual from hazardous materials and contamination. Levels of protection vary and are divided into categories based on the degree of protection afforded. The following constitutes equipment intended for use in a chemical/biological threat environment:

**Level A.** Fully encapsulated, liquid and vapor protective ensemble selected when the highest level of skin, respiratory, and eye protection is required. The following constitutes Level A equipment for consideration:

- Fully Encapsulated Liquid and Vapor Protection Ensemble, reusable or disposable (tested and certified against CB threats)
- Fully Encapsulated Training Suits
- Closed-Circuit Rebreather (minimum 2-hour supply, preferred), or open-circuit Self-Contained Breathing Apparatus (SCBA) or, when appropriate, Air-Line System with 15-minute minimum escape SCBA
- Spare Cylinders/Bottles for rebreathers or SCBA and service/repair kits
- Chemical Resistant Gloves, including thermal, as appropriate to hazard
- Personal Cooling System; Vest or Full Suit with support equipment needed for maintaining body core temperature within acceptable limits
- Hardhat/helmet
- Chemical/Biological Protective Undergarment
- Inner Gloves
- Approved Chemical Resistant Tape
- Chemical Resistant Boots, Steel or Fiberglass Toe and Shank

- Chemical Resistant Outer Booties

**Level B.** Liquid splash resistant ensemble used with highest level of respiratory protection. The following constitute Level B equipment and should be considered for use:

- Liquid Splash Resistant Chemical Clothing, encapsulated or non-encapsulated
- Liquid Splash Resistant Hood
- Closed-Circuit Rebreather (minimum 2-hour supply, preferred), open-circuit SCBA, or when appropriate, Air-Line System with 15-minute minimum escape SCBA
- Spare Cylinders/Bottles for rebreathers or SCBA and service/repair kits
- Chemical Resistant Gloves, including thermal, as appropriate to hazard
- Personal Cooling System; Vest or Full Suit with support equipment needed for maintaining body core temperature within acceptable limits
- Hardhat/helmet
- Chemical/Biological Protective Undergarment
- Inner Gloves
- Approved Chemical Resistant Tape
- Chemical Resistant Boots, Steel or Fiberglass Toe and Shank
- Chemical Resistant Outer Booties

**Level C.** Liquid splash resistant ensemble, with same level of skin protection of Level B, used when the concentration(s) and type(s) of airborne substances(s) are known and the criteria for using air-purifying respirators are met. The following constitute Level C equipment and should be considered for use:

- Liquid Chemical Splash Resistant Clothing (permeable or non-permeable)
- Liquid Chemical Splash Resistant Hood (permeable or non-permeable)
- Tight-fitting, Full Facepiece, Negative Pressure Air Purifying Respirator with the appropriate cartridge(s) or canister(s) and P100 filter(s) for protection against toxic industrial chemicals, particulates, and military specific agents.
- Tight-fitting, Full Facepiece, Powered Air Purifying Respirator (PAPR) with chemically resistant hood with appropriate cartridge(s) or canister(s) and high-efficiency filter(s) for protection against toxic industrial chemicals, particulates, and military specific agents.
- Closed-Circuit Rebreather (minimum 2-hour supply, preferred), open-circuit SCBA, or when appropriate, Air-Line System with 15-minute minimum escape SCBA
- Spare cylinder/bottles for rebreathers or SCBA
- SCBA Service and repair kits
- Equipment or system batteries will include those that are rechargeable (e.g. NiCad) or non-rechargeable with extended shelf life (e.g. Lithium)
- Chemical Resistant Gloves, including thermal, as appropriate to hazard
- Personal Cooling System; Vest or Full Suit with support equipment
- Hardhat

- Inner Chemical/Biological Resistant Garment
- Inner Gloves
- Chemical Resistant Tape
- Chemical Resistant Boots, Steel or Fiberglass Toe and Shank
- Chemical Resistant Outer Booties

**Level D.** Selected when no respiratory protection and minimal skin protection is required, and the atmosphere contains no known hazard and work functions preclude splashes, immersion, or the potential for unexpected inhalation of, or contact with, hazardous levels of any chemicals.

- Escape mask for self-rescue

*Note: During CBRNE response operations, the incident commander determines the appropriate level of personal protective equipment. As a guide, Levels A, B, and C are applicable for chemical/ biological/ radiological contaminated environments. Personnel entering protective postures must undergo medical monitoring prior to and after entry.*

All SCBAs **must** meet standards established by the National Institute for Occupational Safety and Health (NIOSH) for occupational use by emergency preparedness and response personnel when exposed to Chemical, Biological, Radiological and Nuclear (CBRN) agents in accordance with Special Tests under NIOSH 42 CFR 84.63(c), procedure number RCT-CBRN-STP-0002, dated December 14, 2001.

*Grant recipients **must** purchase: 1) protective ensembles for chemical and biological terrorism incidents that are certified as compliant with Class 1, Class 2, or Class 3 requirements of National Fire Protection Association (NFPA) 1994, Protective Ensembles for Chemical/Biological Terrorism Incidents; 2) protective ensembles for hazardous materials emergencies that are certified as compliant with NFPA 1991, Standard on Vapor Protective Ensembles for Hazardous Materials Emergencies, including the chemical and biological terrorism protection; 3) protective ensembles for search and rescue or search and recovery operations where there is no exposure to chemical or biological warfare or terrorism agents and where exposure to flame and heat is unlikely or nonexistent that are certified as compliant with NFPA 1951, Standard on Protective Ensemble for USAR Operations; and, 4) protective clothing from blood and body fluid pathogens for persons providing treatment to victims after decontamination that are certified as compliant with NFPA 1999, Standard on Protective Clothing for Emergency Medical Operations.*

*For more information regarding these standards, please refer to the following web sites:  
The National Fire Protection Association - <http://www.nfpa.org>  
National Institute for Occupational Safety and Health - <http://www.cdc.gov/niosh>*

**2. Explosive Device Mitigation and Remediation** - Equipment providing for the mitigation and remediation of explosive devices in a CBRNE environment:

- Bomb Search Protective Ensemble for Chemical/Biological Response
- Chemical/Biological Undergarment for Bomb Search Protective Ensemble
- Cooling Garments to manage heat stress
- Ballistic Threat Body Armor (not for riot suppression)
- Ballistic Threat Helmet (not for riot suppression)
- Blast and Ballistic Threat Eye Protection (not for riot suppression)
- Blast and Overpressure Threat Ear Protection (not for riot suppression)
- Fire Resistant Gloves
- Bomb blanket, Bomb Suppression Blanket, explosive devices blanket
- Dearmer/Disrupter
- Real Time X-Ray Unit; Portable X-Ray Unit
- CBRNE Compatible Total Containment Vessel (TCV)
- CBRNE Upgrades for Existing TCV
- Robot; Robot Upgrades
- Fiber Optic Kit (inspection or viewing)
- Tents, standard or air inflatable for chem/bio protection
- Inspection mirrors
- Ion Track Explosive Detector

**3. Interoperable Communications Equipment** - Equipment and systems providing connectivity and electrical interoperability between local and interagency organizations to coordinate CBRNE response operations. When utilizing ODP program funds in the category of Interoperable Communications Equipment to build, upgrade, enhance, or replace communications systems, grantees and sub-grantees should develop a comprehensive interoperable communications plan before procurement decisions are made. Guidance for development of interoperable communications plans is provided in **Appendix E**.

- Land Mobile, Two-Way In-Suit Communications (secure, hands-free, fully duplex, optional), including air-to-ground capability (as required)
- Antenna and tower systems
- Leasing and rental of tower space
- Personnel Alert Safety System (PASS) - (location and physiological monitoring systems optional)
- Personnel Accountability Systems
- Individual/portable radios, software radios, portable repeaters, radio interconnect systems, satellite phones, batteries, chargers and battery conditioning systems
- Computer systems designated for use in an integrated system to assist with detection and communication efforts (must be linked with integrated software packages designed specifically for chemical and/or biological agent detection and communication purposes)
- Aviation and maritime security voice and data transmission equipment
- Portable Meteorological Station (monitors temperature, wind speed, wind direction and barometric pressure at a minimum)
- Computer aided dispatch systems and enhancement of 911 systems, and mobile

- computer data systems to include pagers, palm pilots, and cell phones
- Commercially available crisis management software
- Mobile Display Terminals

*Note: In an effort to improve emergency preparedness and response interoperability, all new or upgraded radio systems and new radio equipment should be compatible with a suite of standards called ANSI/TIA/EIAA-102 Phase I (Project 25). These standards have been developed to allow for backward compatibility with existing digital and analog systems and provide for interoperability in future systems. The FCC has chosen the Project 25 suite of standards for voice and low-moderate speed data interoperability in the new nationwide 700 MHZ frequency band. The Integrated Wireless Network (IWN) of the U.S. Justice and Treasury Departments has also chosen the Project 25 suite of standards for their new radio equipment. In an effort to realize improved interoperability, all radios purchased under this grant should be APCO 25 compliant.*

#### **4. Physical Security Enhancement Equipment** - Equipment to enhance the physical security of critical infrastructure.

##### **Surveillance, Warning, Access/Intrusion Control** Ground

- Motion Detector Systems: Acoustic; Infrared; Seismic; Magnetometers
- Barriers: Fences; Jersey Walls
- Impact Resistant Doors and Gates
- Portal Systems; locking devices for access control
- Alarm Systems
- Video Assessment/Cameras: Standard, Low Light, IR, Automated Detection
- Personnel Identification: Visual; Electronic; Acoustic; Laser; Scanners; Cyphers/Codes
- X-Ray Units
- Magnetometers
- Vehicle Identification: Visual; Electronic; Acoustic; Laser; Radar

##### Waterfront

- Radar Systems
- Video Assessment System/Cameras: Standard, Low Light, IR, Automated Detection
- Diver/Swimmer Detection Systems; Sonar
- Impact Resistant Doors and Gates
- Portal Systems
- Hull Scanning Equipment
- Plus all those for Ground
- Vessel Barriers

##### **Sensors – Agent/Explosives Detection**

- Chemical: Active/Passive; Mobile/Fixed; Handheld



- Biological: Active/Passive; Mobile/Fixed; Handheld
- Radiological
- Nuclear
- Ground/Wall Penetrating Radar

#### **Inspection/Detection Systems**

- Vehicle and Cargo Inspection System – Gamma-ray
- Mobile Search and Inspection System – X-ray
- Non-Invasive Radiological/Chem/Bio/Explosives System – Pulsed Neutron Activation

#### **Explosion Protection**

- Blast/Shock/Impact Resistant Systems
- Protective Clothing
- Column and Surface Wraps; Breakage/Shatter Resistant Glass; Window Wraps
- Robotic Disarm/Disable Systems

#### **Support Equipment for Continuation of Critical Infrastructure Operations**

- Large fixed generators
- Fuel storage containers
- Back-up operating computer hardware and programming software
- Self-monitoring sensors and alarms

**5. Terrorism Incident Prevention Equipment (Terrorism Early Warning, Prevention, and Deterrence Equipment and Technologies)** - State and local emergency preparedness, prevention and response agencies will increasingly rely on the integration of emerging technologies and equipment to improve jurisdictional capabilities to deter and prevent terrorist incidents. This includes, but is not limited to, equipment and associated components that enhance a jurisdiction's ability to disseminate advanced warning information to prevent a terrorist incident or disrupt a terrorist's ability to carry out the event, including information sharing, threat recognition, and public/private sector collaboration.

- Data collection/information gathering software
- Data synthesis software
- Geographic Information System information technology and software
- Law enforcement surveillance equipment
- GIS plotter software and printers
- Joint Regional Information Exchange System (JRIES)
- Alert and notification equipment that allows for real-time dissemination of information and intelligence. Examples of this equipment include cellular phones, pagers, text messaging, etc.
- Hardware, software and internet-based systems that allow for information exchange and dissemination
- Fees for use of databases containing terrorist threat information

- Facial recognition hardware and software

**6. CBRNE Logistical Support Equipment** - Logistical support gear used to store and transport the equipment to the CBRNE incident site and handle it once onsite. This category also includes small support equipment including intrinsically safe (non-sparking) hand tools required to support a variety of tasks and to maintain equipment purchased under the grant as well as general support equipment intended to support the CBRNE incident response. The State should also consider procurement of software to assist in tracking and maintaining statewide equipment assets.

- Equipment trailers
- Staging tents and portable shelter units
- Weather-tight containers for equipment storage
- Software for equipment tracking and inventory
- Handheld computers for Emergency Response applications
- Small Hand tools
- Binoculars, head lamps, range finders and spotting scopes (not for weapons use)
- Night vision goggles
- Light and heavy duty generators to operate search and rescue equipment, light sets, water pumps for decontamination sets
- Light sets for nighttime operations/security (including emergency light poles)
- Electrical current detectors and DC to AC inverter equipment
- Equipment harnesses, belts, and vests (including incident command vests)
- Isolation containers for suspected chemical/biological samples
- Bull horns and other PA systems
- Traffic and crowd control devices (traffic and reflective cones, arrow and zone signs, portable barriers)
- Water pumps for decontamination systems
- Bar code scanner/reader for equipment inventory control
- Badging system equipment and supplies
- Cascade system for refilling SCBA oxygen bottles
- SCBA fit test equipment and software to conduct flow testing
- Testing equipment for fully encapsulated suits and respirators
- Cooling/heating/ventilation fans (personnel and decontamination tent use)
- HAZMAT gear bag/box

**7. CBRNE Incident Response Vehicles** - This category includes special-purpose vehicles for the transport of CBRNE response equipment and personnel to the incident site. Licensing and registration fees are the responsibility of the jurisdiction and are not allowable under this grant. In addition, general-purpose vehicles (squad cars, executive transportation, etc.), fire apparatus, and non-CBRNE tactical/armored assault vehicles are not allowable. Allowable vehicles include:

- Mobile command post vehicles
- Hazardous materials (HazMat) response vehicles
- Bomb response vehicles

- Prime movers for equipment trailers
- 2-wheel personal transport vehicles for transporting fully suited bomb technicians, Level A/B suited technicians to the Hot Zone
- Multi-wheeled all terrain vehicles for transporting personnel and equipment to and from the hot zone
- Mobile Command Unit
- Mobile Morgue Unit
- Response vehicles to deploy bomb, hazmat, and special weapons personnel, equipped to detect chemical, biological and radiological materials; these vehicles may be armored to protect these personnel from explosions and projectiles when required to enter hot zones.

**8. CBRNE Reference Materials** - Reference materials and software designed to assist emergency preparedness and response personnel in preparing for and responding to a CBRNE incident. This includes but is not limited to the following:

- NFPA Guide to hazardous materials
- NIOSH Hazardous Materials Pocket Guide
- North American Emergency Response Guide
- Jane's Chem-Bio Handbook
- First Responder Job Aids

**9. CBRNE Response Watercraft** – This category allows for the purchase of surface boats and vessels for port homeland security purposes, including prevention and response. **Grantees are advised to consult with their DHS-ODP Preparedness Officer before obligating funds in this category.** Allowable costs also include the purchase of customary and specialized navigational, communications, safety, and operational equipment necessary to enable such watercraft to carry out their homeland security mission.

Licensing, registration fees, insurance, and all ongoing operational expenses are the responsibility of the grantee or the local units of government and are not allowable under this grant.

**10. Intervention Equipment** – This category allows for the purchase of specialized law enforcement equipment that is necessary to further enhance their capabilities to prevent domestic terrorism incidents. Grantees are reminded that they must comply with 28 CFR, Parts 66 and 70. In addition, when procuring any Title III equipment, grantees must strictly adhere to requirements of 18 U.S.C., Part I, Chapter 119, Section 2512, pertaining to the manufacture, distribution, possession, and advertising of wire, oral, or electronic communications interception devices. This category includes but is not limited to the following:

- Tactical entry equipment (not including weapons)
- Title III Equipment (Pin registers)

- Specialized response vehicles and vessels
- Encrypted technology systems

#### **11. Cyber Security Enhancement Equipment**

- Intrusion detection devices and systems
- Configuration management and patch dissemination tools
- Scanning and penetration tools
- Geographic information systems
- Firewall and authentication technologies
- Network traffic monitoring and analysis systems
- Security hardware and software countermeasures to protect against cyber attacks

#### **12. Other Authorized Equipment and Related Costs**

- Installation costs for authorized equipment purchased
- Maintenance contracts for authorized equipment purchased through ODP grants and acquired through ODP's Homeland Defense Equipment Reuse (HDER) Program
- Training on CBRNE Equipment by Vendors or Local Entities – ODP encourages the use of Domestic Preparedness Equipment Technical Assistance Program (DPETAP) for equipment training; however, manufacturer/vendor equipment training, the cost of overtime to attend the training, and any costs related to having vendor provide training on equipment to State and/or local units of government is allowed to facilitate the training on and fielding of equipment.
- Shipping costs for equipment
- Sales tax on equipment
- Multiple Integrated Laser Engagement System (MILES)

#### **Allowable Training Costs**

- Training courses on building information sharing capacities
- Training that includes methods of target hardening (overtime/backfill costs associated with training)
- Training for facility security personnel (overtime/backfill costs associated with training)
- Training for vessel and port law enforcement security personnel
- Recognition of CBRNE threats
- Weaponization of WMD agents
- History of terrorism and social environments contributing to threats
- Surveillance techniques
- Identifying/assessing critical infrastructure assets, vulnerabilities, and threats
- Intelligence analysis
- Cyber security enhancements

- Multi-cultural training for undercover operations
- Language training
- Joint training with other homeland security entities (Secret Service/Customs and Border Protection)
- Training on the use of interoperable communications equipment

Multiple level training should be focused on a regional model. Grantees using these funds to develop their own courses should address the critical training areas and gaps identified in the State's Homeland Security Strategy and must adhere to the ODP Emergency Responder Guidelines and ODP Prevention and Deterrence Guidelines. These guidelines may be found at:

[http://www.ojp.usdoj.gov/odp/whatsnew/whats\\_new.htm](http://www.ojp.usdoj.gov/odp/whatsnew/whats_new.htm)

***Grantees who wish to use grant funds to support attendance of and/or development of non-ODP sponsored training, must receive approval from ODP prior to using funds for this purpose. Please see Appendix D for the ODP Training Approval Process. Where an ODP sponsored and approved training course or module addresses an allowable training activity enumerated above, States and local jurisdictions are encouraged to adopt the ODP program of instruction, or ensure that materials developed using funds from this program comport with the ODP training.*** Grantees and sub-grantees using funds to develop courses or to attend non-ODP courses will be required to report the number of individuals trained, by discipline and course level, in their bi-annual strategy implementation reports (see **Appendix C**).

In addition, allowable training-related costs include:

**1. Overtime and backfill funding for emergency preparedness and response personnel attending ODP-sponsored and approved training classes** - Payment of overtime expenses will be for work performed by award (SAA) or sub-award employees in excess of the established work week (usually 40 hours). Further, overtime payments are allowed only to the extent the payment for such services is in accordance with the policies of the State or unit(s) of local government and has the approval of the State or the awarding agency, whichever is applicable. In no case is dual compensation allowable. That is, an employee of a unit of government may not receive compensation from their unit or agency of government AND from an award for a single period of time (e.g., 1:00 pm to 5:00 pm), even though such work may benefit both activities. Fringe benefits on overtime hours are limited to FICA, Workers' Compensation and Unemployment Compensation.

**2. Training Workshops and Conferences** - Grant funds may be used to plan and conduct training workshops or conferences to include costs related to planning, meeting space and other meeting costs, facilitation costs, materials and supplies, travel and training plan development.

**3. Full or Part-Time Staff or Contractors/Consultants** - Full or part-time staff may be hired to support training-related activities. Payment of salaries and fringe benefits must be in accordance with the policies of the State or local unit(s) of government and have the approval of the State or the awarding agency, whichever is applicable. The services of contractors/consultants may also be procured by the State in the design, development, conduct, and evaluation of CBRNE training. The applicant's formal written procurement policy or the Federal Acquisition Regulations (FAR) must be followed.

**4. Travel** - Travel costs (i.e., airfare, mileage, per diem, hotel, etc.) are allowable as expenses by employees who are on travel status for official business related to the planning and conduct of the training project(s) or for attending ODP-sponsored courses. These costs must be in accordance with either the federal or an organizationally-approved travel policy.

**5. Supplies** - Supplies are items that are expended or consumed during the course of the planning and conduct of the training project(s) (e.g., copying paper, gloves, tape, and non-sterile masks).

**6. Other Items** - These costs include the rental of space/locations for planning and conducting training, badges, etc.

### **Allowable Exercises Costs**

- Exercises to evaluate the effectiveness of information sharing plans, policies, procedures and protocols
- Exercises to evaluate facility and/or vessel security protection
- Exercises to evaluate area maritime security protection
- Exercises to evaluate threat recognition capabilities
- Exercises to evaluate cyber security capabilities
- Exercises to evaluate prevention readiness and techniques
- "Red Team" (force on force) exercises
- Interoperable communications exercises

Funds may be used to plan for, design, develop, conduct, and evaluate exercises that train homeland security preparedness, prevention and response personnel, evaluate prevention and response plans, policy, procedures and protocols, and assess the readiness of jurisdictions to prevent and respond to a terrorist attack. Exercises must be threat and performance-based, in accordance with ODP's Homeland Security Exercise and Evaluation Program (HSEEP) manuals. These manuals provide explicit direction on the design, conduct, and evaluation of terrorism exercises. Exercises conducted with ODP support (grant funds or direct support) must be managed and executed in accordance with HSEEP. (See [www.ojp.usdoj.gov/odp/exercises/State.htm](http://www.ojp.usdoj.gov/odp/exercises/State.htm)) After action reports must be provided to ODP within 60 days following completion of each exercise (see **Appendix A**). DHS-

ODP Exercise Managers will be assisting their assigned States throughout development and implementation of exercise programs. States and local units of government should consider their ODP Exercise Managers as their point of contact for questions and concerns regarding implementation of the HSEEP.

Grantees that wish to expend funds on models, games, simulations must consult with “Review of Models, Simulations, and Games for Domestic Preparedness Training and Exercising, Volume I,” which provides an overview and analysis of existing models, games and simulations. **This report is available at [www.ojp.usdoj.gov/odp/exercises/State.htm](http://www.ojp.usdoj.gov/odp/exercises/State.htm)**

Allowable exercise-related costs include:

- 1. Exercise Planning Workshop** - Grant funds may be used to plan and conduct an Exercise Planning Workshop to include costs related to planning, meeting space and other meeting costs, facilitation costs, materials and supplies, travel and exercise plan development.
- 2. Full or Part-Time Staff or Contractors/Consultants** - Full or part-time staff may be hired to support exercise-related activities. Payment of salaries and fringe benefits must be in accordance with the policies of the State or unit(s) of local government and have the approval of the State or the awarding agency, whichever is applicable. The services of contractors/consultants may also be procured to support the design, development, conduct and evaluation of CBRNE exercises. The applicant's formal written procurement policy or the Federal Acquisition Regulations (FAR) must be followed.
- 3. Overtime and backfill costs** – Overtime and backfill costs associated with the design, development and conduct of CBRNE exercises are allowable expenses. Payment of overtime expenses will be for work performed by award (SAA) or sub-award employees in excess of the established work week (usually 40 hours) related to the planning and conduct of the exercise project(s). Further, overtime payments are allowed only to the extent the payment for such services is in accordance with the policies of the State or unit(s) of local government and has the approval of the State or the awarding agency, whichever is applicable. In no case is dual compensation allowable. That is, an employee of a unit of government may not receive compensation from their unit or agency of government AND from an award for a single period of time (e.g., 1:00 pm to 5:00 pm), even though such work may benefit both activities. Fringe benefits on overtime hours are limited to FICA, Workers' Compensation and Unemployment Compensation.
- 4. Travel** - Travel costs (i.e., airfare, mileage, per diem, hotel, etc.) are allowable as expenses by employees who are on travel status for official business related to the planning and conduct of the exercise project(s). These costs must be in accordance with either the Federal or an organizationally-approved travel policy.

**5. Supplies** - Supplies are items that are expended or consumed during the course of the planning and conduct of the exercise project(s) (e.g., copying paper, gloves, tape, and non-sterile masks).

**6. Implementation of HSEEP** - Costs related to setting up and maintaining a system to track the completion and submission of AARs and the implementation of corrective actions from exercises, which may include costs associated with meeting with local units of government to define procedures. *(Note: ODP is developing a national information system for the scheduling of exercises and the tracking of AAR/CAPs to reduce the burden on the States and to facilitate national assessments of preparedness.)*

**7. Other Items** - These costs include the rental of space/locations for exercise planning and conduct, exercise signs, badges, etc.

### **Allowable Management and Administrative Costs**

No more than 3% of the total amount allocated to the State for LETPP may be used statewide for management and administrative (M & A) purposes. Any portion of the 3% retained by the State must be included within the 20% of total funds available to the State. For example, if a State receives a LETPP award of \$1,000,000, the State must pass through \$800,000 to local units of government. The total M&A funds available statewide would be \$30,000.

The following is a list of allowable M&A expenditures:

- Hiring of full-time or part-time staff or contractors/consultants to assist with the management of LETPP FY2004
- Hiring of full-time or part-time staff or contractors/consultants to assist with the implementation and administration of the State Homeland Security Strategy
- Travel expenses
- Meeting-related expenses (For a complete list of allowable meeting-related expenses, please review the OJP Office of the Comptroller (OC) Financial Guide at <http://www.ojp.usdoj.gov/FinGuide>).
- Acquisition of authorized office equipment *(Note: Authorized office equipment includes personal computers, laptop computers, printers, LCD projectors, and other equipment or software which may be required to support the implementation of the State strategy.)*
- Recurring fees/charges associated with certain equipment, such as cell phones, faxes, etc.
- Leasing and/or renting of space for newly hired personnel to administer the LETPP.



#### **D. Unauthorized Program Expenditures**

Unauthorized program expenditures include: 1) expenditures for items such as general-use software (word processing, spreadsheet, graphics, etc), general-use computers (other than for allowable M & A activities, or otherwise associated preparedness or response functions) and related equipment, general-use vehicles, licensing fees, weapons systems and ammunition; 2) activities unrelated to the completion and implementation of the LETPP Program; 3) other items not in accordance with the Authorized Equipment List or previously listed as allowable costs; and, 4) construction or renovation of facilities.